

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Serial No. .... 10/017,469  
Filing Date .....December 14, 2001  
Inventorship.....Nirkhe  
5 Assignee.....Microsoft Corporation  
Group Art Unit ..... 2151  
Examiner .....K.Q. Dinh  
Attorney's Docket No. ....MS1-0928US  
10 Title: User Name Mapping

APPELLANT'S REPLY BRIEF

TO EXAMINER'S ANSWER MAILED JULY 10, 2008

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To: Honorable Commissioner of Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

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From: Brian J. Pangrle  
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Appellant hereby files a Reply Brief to the Examiner's Answer of July 10,  
2008. Appellant's Opening Appeal Brief of April 28, 2007 seeks review of the  
grounds of rejection in the Final Office Action of October 30, 2006.

**Reply to Argument**

Heading (10) of the Examiner's Answer (at page 14) sets forth the following, relisted as A, B, C and D:

5           A.     *Appellant asserts that the prior Art (Blakely) teaches away does not support motivation.*

10           Examiner respectfully disagrees. Examiner respectfully point out that Blakely also suggests providing user access to resources on servers with different operating systems such as DOS, OS/2, Macintosh (see col. 1 lines 19-40). Therefore, Blakley (the primary reference) also supports the motivation to combine the references.

15           B.     *Appellant asserts that the proposed modification would change principle of operation.*

20           Examiner respectfully point out that it would have been obvious to one of the ordinary skill in the art at the time the invention was made to implement Smith's teachings into the computer system of Blakley to manage network communication in different network operating systems because it would have allowed users to retrieve and to display web documents from different operating systems in a communication network (see Smith's col. 6 lines 11-32). Examiner provided the good motivation to combine the references of Blakely and Smith as shown in the secondary reference (Smith). Therefore, Examiner respectfully submits that the proposed modification would not change the principle of the operation.

30           C.     *Appellant asserts that the evidence insufficient to support reasonable expectation of success.*

35           Examiner respectfully point out that it would have been obvious to one of the ordinary skill in the art at the time the invention was made to implement Smith's teachings into the computer system of Blakley to manage network communication in different network operating systems because it would have allowed users to retrieve and to display web documents from different operating systems in a communication network (see Smith's col. 6 lines 11-32). Examiner has provided a sufficient motivation to

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combine the references of Blakely and Smith as shown in the secondary reference (Smith). Therefore, the Appellant's arguments are not persuasive.

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*D. Appellant asserts that the Blakely reference does not disclose a map on a mapping server.*

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Examiner respectfully point out that Blakely reference discloses a map on a mapping server (Gateway Server 28 fig. 1) [implementing the Gateway Server to control users' access to the subsystems (network 8 and network 10 of fig. 1 ) and using the operating system for mapping unique pairs (user handles and user names) into its own view with users' credentials and access privileges when users access to all security subsystems on the system, see abstract, figs. 1 , 2, 3A, col. 3 line 14 to col. 4 line 57 and col. 5 lines 1-28]. The purpose of the mapping function is to ensure that the user names representing the same users to all security subsystems on the system.

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Reply to A: Teaches Away

The Office states that "Blakely also suggests providing user access to resources on servers with different operating systems such as DOS, OS/2, Macintosh (see col. 1 lines 19-40)".

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The cited evidence in the Blakely reference at col. 1, lines 19-40 is as follows:

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Many computer applications typically were written for operating systems that did not provide any security. The designers of these applications realized that a security system would be useful for certain clients and so the designers added security systems to their applications. Some of these applications are server programs that allow users to access resources on that server and to run processes on the server on their behalf. Some examples of operating systems without initial security measures are DOS, OS/2, and Macintosh OS.

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5 In the case for OS/2, some examples of processes that allow  
users access include TELNET, OS/2, LAN SERVER, and  
NETRUN. TELNET is a program that allows multiple users to log  
in across a network and access an OS/2 TELNET server as if they  
were sitting in front of it. TELNET is part of the OS/2 TCP/IP  
offering. OS/2 LAN SERVER is a program that grants remote  
users access to resources such as, for example, files, print  
queues, and serial devices, on an OS/2 LAN SERVER. The  
10 NETRUN program allows remote users to execute processes on  
their behalf on an OS/2 LAN SERVER. Each of these programs  
has its own security measures.

Appellant has examined the evidence and finds that the Blakely  
reference teaches a "method and system for providing a user access to multiple  
15 secured subsystems" (title) under a single operating system. Indeed, the  
solution of the Blakely reference is explicitly a single operating system that  
unifies security protocols for each user (see col. 2, lines 31-37).

The evidence cited by the Office in the Examiner's Answer makes this  
clear. Specifically, the Blakely reference teaches a security problem associated  
20 with individual operating systems ("[s]ome examples of operating systems  
without initial security measures are DOS, OS/2, and Macintosh OS") and then  
provides a detailed example of for the OS/2 operating system.

The cited portion of the Blakely reference explicitly states "TELNET is  
part of the OS/2 TCP/IP offering". Appellant submits that with TELNET (circa  
25 1994), one logs on to a target computer as a regular user. In such an example,  
even if the target computer had multiple operating systems, TELNET would  
require a user to log on to the target computer under each separate user  
account for each operating system.

Appellant submits that the Office has not argued modification of the TELNET command and protocol system for log on to a target computer with multiple operating systems. Appellant further submits that the Office has not argued modification of the TELNET system for using a single log on "user name" to log on to a target computer with one operating system and to log on to another target computer with a second, different operating system. Yet further, Appellant submits that the Office has not argued modifying the TELNET system to use a "user name" to log on to a first network that uses a first operating system and to log on to a second network that uses a second, different operating system.

The three sentences of the foregoing paragraph demonstrate how convoluted and tenuous the logic would be to jump from the cited evidence to the claimed subject matter. In other words, Appellant finds the TELNET system of col. 1, lines 19-40 as the best evidence; however, as demonstrated above, this evidence falls short.

Appellant contends that the Office is relying on perhaps the "worst evidence" to make a *prima facie* case under §103, as the evidence of DOS, OS/2 and Macintosh OS in the Blakely reference is provided solely to emphasize security issues associated with these individual operating systems. When the OS evidence is combined with the single operating solution (col. 2, lines 31-37 and see also col. 4, lines 19-20 ("[a]ll these systems [applications and the proposed mechanism for secure access to these applications] coexist

under a single operating system")), Appellant concludes that the Blakely reference teaches away from any type of solution associated with more than one type of OS (see MPEP §2145, "[i]t is improper to combine references where the references teach away from their combination").

5 Appellant also directs the Board to the Opening Appeal Brief, which provides a more detailed analysis of the evidence.

Reply to B: Change Principle of Operation

The Office states that "it would have been obvious . . . to implement  
10 Smith's teachings into the computer system of Blakely to manage network communication in different network operating systems because it would have allowed users to retrieve and to display web documents from different operating systems in a communication network (see Smith's col. 6 lines 11-32)".

In Appellant's Opening Appeal Brief, Appellant stated:

15 If an additional operating system was introduced into the system of the Blakely reference, the entire approach for handling application specific security issues would become irrelevant. In other words, the Blakely reference's system would need to  
20 operate according to a different principle.

As explained in the Opening Appeal Brief, the Blakely reference's OS associates a user handle (UH) and user name (UN) pair with the user's credentials for the security measures of the various applications running on the OS (col. 4, lines 33-58; see "User A" of Figs. 3A and 3B). As explicitly stated:  
25 "All these systems [applications and the proposed mechanism for secure

access to these applications] coexist under a single operating system" (col. 4, lines 19-20).

Again, Appellant finds that any modification to the "single operating system" of the Blakely reference to account for heterogeneous networks would be primary to the security issues addressed by the Blakely reference, i.e., make any teachings of problems and solutions to the security issues irrelevant. In other words, it is likely that any proposed modification to handle heterogeneous networks would supplant the entire "secure OS" approach.

10 Reply to C: No Reasonable Likelihood of Success

Again, the Office points to combining references to "manage network communication in different network operating systems because it would have allowed users to retrieve and to display web documents from different operating systems in a communication network". When investigating the "best evidence", Appellant fails to find logical links between the single OS TELNET sessions of the Blakely reference and the stated retrieval and display of "web documents from different operating systems in a communication network". In other words, regardless of what the Smith reference discloses, modification of the single OS TELNET system of the Blakely reference to meet the claimed subject matter would be a significant undertaking. Evidence as to how such an undertaking could be achieved is lacking. For this reason, Appellant finds insufficient

evidence to support a finding that a reasonable likelihood of success exists.

Hence, the Office's *prima facie* case is faulty.

Reply to D: Map on a Mapping Server

5           The Office contends that the Blakely reference discloses a map on a mapping server and cites the "Gateway Server 28" of Fig. 1. Per MPEP §2111, "the pending claims must be 'given their broadest reasonable interpretation consistent with the specification'." Appellant finds that the Office inappropriately broadens the claim terms "map on a mapping server" in an effort to find an  
10   equivalent in the Blakely reference. The claims provide explicit guidance as to the meaning of "map" and "mapping". Hence, Appellant submits that the Office's finding that the single OS system of the Blakely reference (for associating a user handle and a user name) is a "mapping server" is unsupported by objective evidence of record.

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Conclusion

Appellant respectfully requests that the Board reverse the Examiner's rejection for the specific grounds of rejection identified in the Opening Appeal Brief. Should any issue remain that prevents furtherance of this Appeal, the  
20   Board or Office is encouraged to contact the undersigned attorney to discuss the unresolved issue.



Respectfully Submitted,  
  
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Dated: Sept. 10, 2008

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